

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: ARC AIRBAGS INFLATORS
PRODUCTS LIABILITY
LITIGATION

Applies to:
ANDERSON et al. v. AUTOLIV, INC.
et al., C.A. No. 23-11601

MDL No. 3051

Case No.: 1:22-MD-3051-ELR

District Judge Eleanor L. Ross

**DEFENDANT ZF
FRIEDRICHSHAFEN AG’S.
MOTION TO DISMISS
PLAINTIFFS’ CONSOLIDATED
CLASS ACTION COMPLAINT**

Defendant ZF Friedrichshafen AG (“ZF Friedrichshafen”) *specially appears*¹ and moves to dismiss Plaintiffs’ Corrected Consolidated Class Action Complaint (the “CAC”). This motion is based on the concurrently filed Memorandum of Law in Support. Specifically, ZF Friedrichshafen seeks an order dismissing the CAC with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(2) because the Court lacks personal jurisdiction over ZF Friedrichshafen in this action.

ZF Friedrichshafen further moves to dismiss the CAC with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) on the grounds stated in the Tier 1 Suppliers’ Motion to Dismiss (Dkt. 178), and incorporates the arguments made in support thereof.

¹ In filing this Motion, ZF AG does not waive, and expressly reserves, its right to Rule 12(b) defenses and any due process arguments, should it need to invoke them.

Respectfully submitted this 25th day of November, 2024.

/s/ Sean M. Berkowitz

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